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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Attorney Docket No.: Bell-17 (00-VE02.64)

Appl. No.: 09/487,049

Applicants: Mohammad Reza SHAFIEE, Sankar SUBRAMANIAN

Filed: January 19, 2000

Title: METHODS AND APPARATUS FOR PROVIDING AGENT CONTROLLED SYNCHRONIZED BROWSING AT A TERMINAL

TC/A.U.: 3621

Examiner: John W. Hayes

Mail Stop Appeal Brief-Patents Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

SIR:

APPEAL BRIEF

Further to the Notice of Appeal filed on October 23, 2003 and granted a date of receipt of October 27, 2003 by the U.S. Patent & Trademark Office, which set a period of response to expire on December 27, 2003, the applicants request that the Board reverse all outstanding grounds of rejection in view of the following.

I. Real Party In Interest

The real party in interest is Verizon Services Corp. An assignment of the above referenced patent application from the inventors to Bell Atlantic Network Services, Inc. was recorded in the Patent Office starting at Frame 0395 of Reel 010515. The name of Bell Atlantic Network Services, Inc. was changed to Verizon Services Corp. by a Certificate of Amendment of Restated Certificate of Incorporation of Bell Atlantic Network Services, Inc. dated July 21, 2000, filed with the Delaware Secretary of State on

July 26, 2000, effective August 1, 2000. A copy of the Certificate of Amendment and a copy of a certification by the Delaware Secretary of State are filed herewith.

II. Related Appeals and Interference

There are no related appeals or interferences.

III. Status of Claims

Claims 1-14, 20-30 and 33-42 are pending and rejected.

More specifically, claims 1, 2, 5-10, 28, 40 and 42 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,493,447 ("the Goss patent") in view of U.S. Patent Publication No. US2001/0054064A1 ("the Kannan publication").

Claims 3, 4, 29, 30 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Kannan publication, and further in view of U.S. Patent No. 5,784,564 ("the Camaisa patent").

Claims 11-13, 20, 33, 34, 36 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,181,689 ("the Choung patent").

Claims 14, 21, 22 and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Choung patent, in view of the Kannan publication.

Claims 23, 26, 27, 38 and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Camaisa patent.

Claims 24 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Camaisa patent, and further in view of the Kannan publication.

Claims 15-19, 31 and 32 have been cancelled.

IV. Status of Amendments

All amendments have been entered. No amendments were filed subsequent to the final Office Action mailed on June 23, 2003 (Paper No. 12).

V. Summary of the Invention

One aspect of the present invention concerns a guide terminal performing a method for effecting a synchronized browsing session with a follower terminal. The method may include (a) accepting a synchronized browsing command from an input device of the guide terminal, (b) encrypting the synchronized browsing command based on encryption information associated with the follower terminal (See, e.g., page 26, line 30 through page 27, line 17), and (c) sending the encrypted synchronized browsing command to follower terminal. (See, e.g., blocks 2525 and 2565 of Figure 25, and page 40, line 7 through page 41, line 21.)

Another aspect of the present invention concerns a method for establishing and effecting a synchronized browsing session between a guide terminal and a follower terminal configured such that at least one of downloading applets is disabled and execution of applets is disabled. (See, e.g., Figure 19 and page 8, lines 21-30.) The method may include (a) providing address information related to the follower terminal to the guide terminal, (b) providing address information related to the guide terminal to the follower terminal, (See, e.g., Figure 15, page 21, lines 24 through page 22, line 30, and page 25, line 23 through page 26, line 21, and page 26, line 30, through page 27, line 4.), (c) sending, from the guide terminal, a browsing command to the follower terminal (See, e.g., 1935 of Figure 19 and 2565 of Figure 25.), (d) receiving, with the follower terminal, the browsing command (See, e.g., 1935 of Figure 19 and 2025 of Figure 20.), and (e) effecting, with a browser at the follower terminal, the received browsing command (See, e.g., 2035 of Figure 20.) wherein the browser at the follower terminal is resident on the follower terminal before any connection between the follower terminal and the guide terminal (See, e.g., page 37, lines 10-14.).

Yet another aspect of the present invention concerns a follower terminal performing a method for effecting a synchronized browsing session with a guide terminal. The method may include (a) accepting a synchronized browsing command from the guide terminal (See, e.g., 2025 of Figure 20 and page 32, lines 10-13.), (b) sending an acknowledge reply to the guide terminal in response to the acceptance of the synchronized browsing command (See, e.g., 2030 of Figure 20 and page 32, lines 13-16.), (c) determining whether access to content associated with the browsing

command is permitted (See, e.g., 2035 of Figure 20, Figure 21, and page 32, lines 13-17 and page 33, line 11 through page 35, line 6.), and (d) if it is determined that access to the content associated with the browsing command is permitted, then requesting the content associated with the browsing command (See, e.g., 2140 of Figure 21 and page 34, lines 20 and 21.).

In some embodiments, the follower terminal is configured such that at least one of downloading applets is disabled and execution of applets is disabled. (See, e.g., page 4, lines 13-20, page 8, line 23-26 and page 45, lines 24 and 25.)

In some embodiments, the browsing command is encrypted. (See, e.g., 2565 and page 41, lines 9-13.)

In some embodiments, the guide terminal may further determine whether or not access to content associated with the browsing command is permitted, so that the steps of (b) encrypting the synchronized browsing command and (c) sending the synchronized browsing command are performed only if it is determined that access to content associated with the browsing command is permitted. (See, e.g., blocks 2535-2560 of Figure 25 and page 40, line 19 through page 41, line 13.) In some embodiments of the present invention whether access to content associated with the browsing command is permitted may be determined by (i) determining whether or not the browsing command includes a resource locator that has a NO GO status based on at least one of first rules regarding resource locators and a first list of resource locators (See, e.g., 2540 of Figure 25, Figure 22 and page 40, lines 23-26.), (ii) if it is determined that the browsing command includes a resource locator that has a NO GO status, then (A) setting a status to NO GO (See, e.g., 2545 of Figure 25 and page 40, lines 28-31.), (B) determining whether or not the browsing command includes a resource locator that has a GO status based on at least one of second rules regarding resource locators and a second list of resource locators (See, e.g., 2550 of Figure 25, Figure 22 and page 40, lines 31 and 32.), and (C) if it is determined that the browsing command includes a resource locator that has a GO status, then setting the status to GO (See, e.g., 2555 of Figure 25 and page 41, lines 3-6.), and (iii) requesting the content associated with the browsing command if the status is GO (See, e.g., 2565 of Figure 25 and page 41, lines 9-13.).

VI. Issues

The issues presented for review are whether (separately patentable groups of) claims:

- 1, 2, 5-10, 28, 40 and 42 are unpatentable, under 35 U.S.C. § 103(a), over the Goss patent in view of the Kannan publication;
- 3, 4, 29, 30 and 39 are unpatentable, under 35 U.S.C. § 103(a), over the Goss patent in view of the Kannan publication, and further in view of the Camaisa patent;
- 11-13, 20, 33, 34, 36 and 37 are unpatentable, under 35 U.S.C. § 103(a), over the Choung patent;
- 14, 21, 22 and 35 are unpatentable, under 35 U.S.C. § 103(a), over the Choung patent in view of the Kannan publication;
- 23, 26, 27, 38 and 41 are unpatentable, under 35 U.S.C. § 103(a), over the Goss patent in view of the Camaisa patent; and
- 24 and 25 are unpatentable, under 35 U.S.C. § 103(a), over the Goss patent in view of the Camaisa patent, and further in view of the Kannan publication.

VII. Grouping of Claims

The claims do not stand or fall together.

For purposes of this Appeal, Appellant proposes the following grouping of claims:

Group I: Claims 1, 2, 5-10, and 28 are grouped together with claim 28 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. Accordingly, claims 1, 2, 5-10 and 28 stand together.

Group II: Claims 40 and 42 are separately grouped with claim 40 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. Although the claims of Group II are subject to the same rejection as the claims of Group I, these claims are separately patentable because representative claim 40 further recites that the follower terminal is configured such that at least one of downloading applets is disabled and execution of applets is disabled. Accordingly, claims 40 and 42 stand together.

Group III: Claims 3, 4, 29, and 30 are grouped together with claim 3 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. These claims are subject to a different rejection than the claims of Groups I and II. Accordingly, claims 3, 4, 29 and 30 stand together.

Group IV: Claim 39 is separately grouped. This claim is subject to a different rejection than the claims of Groups I and II. Although the claim of Group IV is subject to the same rejection as the claims of Group III, this claim is separately patentable because it further recites acts of (1) determining whether or not a browsing command includes a resource locator that has a NO GO status based on at least one of first rules regarding resource locators and a first list of resource locators, and (2) if it is determined that the browsing command includes a resource locator that has a NO GO status, then (a) setting a status to NO GO, (b) determining whether or not the browsing command includes a resource locator that has a GO status based on at least one of second rules regarding resource locators and a second list of resource locators, and (c) if it is determined that the browsing command includes a resource locator that has a GO status, then setting the status to GO. Finally, claim 39 further recites that the content associated with the browsing command is requested if the status is GO.

Group V: Claims 11-13, 20, 33, 34, 36 and 37 are grouped together with claim 11 being selected as the single claim from the group upon which the appealed ground of rejection

should be decided. These claims are subject to a different rejection than the claims of Groups I-IV. Accordingly, claims 11-13, 20, 33, 34, 36 and 37 stand together.

Group VI: Claims 14, 21, 22 and 35 are grouped together with claim 35 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. These claims are subject to a different rejection than the claims of Groups I-V. Accordingly, claims 14, 21, 22 and 35 stand together.

Group VII: Claims 23, 26 and 41 are grouped together with claim 23 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. These claims are subject to a different rejection than the claims of Groups I-VI. Accordingly, claims 23, 26 and 41 stand together.

Group VIII: Claims 27 and 38 are separately grouped with claim 27 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. These claims are subject to a different rejection than those of Groups I-VI. Although the claims of Group VIII are subject to the same rejection as the claims of Group VII, these claims are separately patentable because representative claim 27 further recites that whether access to content associated with the browsing command is permitted is determined by (i) determining whether or not the browsing command includes a resource locator that has a NO GO status based on at least one of first rules regarding resource locators and a first list of resource locators, (ii) if it is determined that the browsing command includes a resource locator that has a NO GO status, then (A) setting a status to NO GO, (B) determining whether or not the browsing command includes a resource locator that has a GO status based on at least one of second rules regarding resource locators and a second list of resource locators, and (C) if it is determined that the browsing command includes a resource locator that has a GO status, then setting the status to GO, and (iii) requesting the content associated with the browsing command if the status is GO. Accordingly, claims 27 and 38 stand together.

Group IX: Claims 24 and 25 are grouped together with claim 24 being selected as the single claim from the group upon which the appealed ground of rejection should be decided. These claims are subject to a different rejection than the claims of Groups I-VIII. Accordingly, claims 24 and 25 stand together.

VIII. Argument

The applicant respectfully requests that the Board reverse the final rejection of claims 1-14, 20-30 and 33-42 in view of the following.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 1, 2, 5-10, 28, 40 and 42 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Kannan publication. The applicants respectfully request that the Board reverse this ground of rejection in view of the following. Separate groups are addressed separately.

Group I: Claims 1, 2, 5-10, and 28

Independent claims 1 and 28 are not unpatentable in view of the Goss patent and the Kannan publication at least because these references fail to teach or suggest encrypting a synchronized browsing command. The Examiner concedes that the Goss patent fails to disclose encrypting a browsing command by a guide terminal and decrypting the command by a follower terminal. (Paper No. 12, page 4.) In an effort to compensate for this admitted deficiency of the Goss patent, the Examiner relies on the Kannan publication. More specifically, the Examiner contends that the Kannan publication uses secure socket layer or some other security technique, such as secure hypertext transport protocol to keep a customer service transaction secure. (Paper No. 12, page 4.) The Examiner then concludes that it would have been obvious to one of ordinary skill in the art to modify the method of the Goss patent to encrypt browsing commands, arguing that the Kannan publication suggests that "communication between a customer and a seller must also be secure and private so that the parties can ask questions

and exchange personal data such as credit card information to complete the transaction." (Paper No. 12, 5)

The applicants respectfully note that the security measures espoused in the Kannan publication are apparently limited to securing personal information, such as questions, personal data, and credit card information, needed "to complete a commercial transaction." See paragraph [0010] of the Kannan publication. Securing such personal information with encryption in no way suggests securing a browsing command using encryption. Accordingly, independent claims 1 and 28 are not rendered obvious by the Goss and Kannan references for at least this reason. Since claims 2 and 5-10 depend, either directly or indirectly, from claim 1 these claims are similarly allowable.

Group II: Claims 40 and 42

Since claims 40 and 42 depend from claims 1 and 28, respectively, they are allowable over the Goss patent and the Kannan publication for the reasons discussed above with reference to the claims of Group I.

Further, the Examiner concedes that the Goss patent fails to specifically disclose that the follower terminal is configured such that downloading and/or executing applets is disabled, but argues that disabling applets is known. (See Paper 12, page 5.) Although disabling applets is known, the Examiner has provides no motivation why one skilled in the art would have been motivated to disable applets in the Goss/Kannan combination proposed by the Examiner. Indeed, the Goss and Kannan references rely on applets to function. For example, the Goss patent states:

The http communications through the Web site may be enabled and enhanced by Java applets that may be stored on the Web Server that provides the Web site, on the Contact Server, or on a secure data server. These Java applets may then be simultaneously downloaded to and executed on the agent's and customer's Web browsers. The present invention also provides means to synchronize the execution applets on each desktop to ensure that the agent and customer may communicate with respect to the same data. [Emphasis added.]

Column 2, line 61 through column 3, line 2. It further states:

In the preferred embodiment of the Contact Server 28 and the call-back services it provides, a customer uses a PC equipped with a Web browser 44 to access a Web site that is supported by the Web Server 30 on the call center's Intranet Server 66. This Web site is secured and requires user authentication. Therefore, a customer must first be setup with a user profile. User profiles may be stored on the Database Server 34, and contain the customer's user i.d., password, and any other data as needed by the particular service. When the customer 42 has been authenticated, the Web Server 30 sends an HTML file that represents the site's home page to the customer's browser 44. Embedded in this file are the Java applets that manage the callback services and TCP/IP sessions with agents 14. The Web Server 30 maintains a session with the customer's browser 44, using cookies or other session maintenance methodology.

While browsing the Web site, the customer 42 may encounter a need to speak with a call center agent. For example, if the Web site provides access to the trouble ticket database, a customer 42 may view a status of their trouble tickets and subsequently have a question. This is where the call-back service of the present invention is used. An option to place a call-back request is presented; this may be as a floating tool bar or an HTML button presented on each page of the Web site. When selected, the Java applet running on the customer's browser 44 presents a dialog box, which prompts the customer for call-back information. This generally includes the customer's name. call-back telephone number, and perhaps other information as needed. When the customer hits enter, the browser sends a message containing this information to the Intranet Server 66, via the Internet 32. [Emphasis added.]

Column 5, lines 63-column 6, line 25. The Goss patent also states:

Establishment and maintenance of the TCP/IP session between the agent and customer is a novel feature. The <u>Java applets that run on</u> the agent's browser and the customer's browser 44 pass the events performed by the agent and customer to each other. This is very useful in conjunction with a telephone conversation. As the agent

assists the customer 42 via verbal communication, the agent can display examples or point to items on the Web page. As the agent types in text or performs other visible actions on their browser, the agent hits an update option on their browser. The update action causes the Java applet that is running to send the updates (agent's actions) to the Web Server 30. These updates can either be pushed to the customer browser 44, or the customer can pull them from the Web Server 30. Updates are sent in a proprietary application protocol that uses TCP/IP messaging. The Java applet running on the customer browser reads these updates and performs them on the customer browser 44. [Emphasis added.]

Column 8, lines 46-63. Similarly, the Kannan publication states:

A method, system, and computer program product provides live customer service between a customer and a CSR in real-time over the World Wide Web. Customer service for the Web is provided which is secure, private and responsive to particular customer needs. Queries sent by potential customers browsing a Web site are intelligently routed to appropriate customer service representatives. Potential customers browsing a Web site are also intelligently routed to appropriate customer service representatives. A memory coupled to a server stores a CS enabled Web site having a service applet. When a customer browses the CS-enabled Web site, the service applet is downloaded and executes in a customer computer to support the live customer service. The server executes a customer service agent. The customer service agent enables a customer service window to be displayed by the customer browser. A CSR window is displayed on a browser of the CSR. The customer service agent and service applet determine whether a customer qualifies for live customer service. The level of customer service to be provided can be based at least upon one of the following: browsing data gathered while the customer browses the CS enabled Web site; a customer profile; and a policy of the CS enabled Web site. The customer service window can include a service dialog window and/or a service form. Polling allows a customer to be notified while the customer is browsing the Web that a CSR has chosen to respond to the query input by the customer. Messages are encapsulated/de-encapsulated in HyperText Transport

Protocol (HTTP) to pass through Internet firewalls. Secure communication for Web-based customer service is provided. Communication between the customer and the CSR can be supervised and customer service performance can be tracked. [Emphasis added.]

Abstract.

As can be appreciated from the foregoing, one skilled in the art would not have been motivated to disable applets and/or prevent their download because the Goss and Kannan references both rely on applets to work. Accordingly, claims 40 and 42 are not rendered obvious by the Goss and Kannan references for at least this reason.

Claims 3, 4, 29, 30 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Kannan publication, and further in view of the Camaisa patent. The applicants respectfully request that the Board reverse this ground of rejection in view of the following. Separate groups are addressed separately.

Group III: Claims 3, 4, 29, and 30

The Camaisa patent is cited for the purpose of teaching limiting access to web sites. This purported teaching does not compensate for the deficiencies of the Goss patent and the Kannan publication as applied to claims 2 and 28 above. Accordingly, these claims are similarly allowable for the same reasons discussed above with reference to the claims of Group I.

Moreover, one skilled in the art would not have been motivated to combine these patents as proposed by the Examiner. More specifically, restricting a user's access may be a legitimate concern in a system such as the Camaisa patent where browsing is unguided. However, this does not suggest restricting access in a system where a *guide* terminal leads a synchronized browsing session as in the Goss patent. Accordingly, these claims are not rendered obvious by the Goss patent, the Kannan publication and the Camaisa patent for at least this additional reason.

Group IV: Claim 39

Since claim 39 depends from claim 29, it is not rendered obvious by the Goss. Kannan and Camaisa references for the reasons discussed above with reference to the claims of Group III. Further, the Camaisa patent neither teaches, nor suggests, (1) determining whether or not a browsing command includes a resource locator that has a NO GO status based on at least one of first rules regarding resource locators and a first list of resource locators, and (2) if it is determined that the browsing command includes a resource locator that has a NO GO status, then (a) setting a status to NO GO, (b) determining whether or not the browsing command includes a resource locator that has a GO status based on at least one of second rules regarding resource locators and a second list of resource locators, and (c) if it is determined that the browsing command includes a resource locator that has a GO status, then setting the status to GO. Finally, claim 39 recites that the content associated with the browsing command is requested if the status is GO. The Camaisa patent merely discloses a simple list of permissible Websites. It neither teaches, nor suggests, the two-step process of (1) checking a first list to filter out, and (2) if filtered out, checking a second list to allow back in, as in dependent claim 39. This advantageously permits filtering out a large amount of content and allowing a smaller set of content back. (See, e.g., page 34, lines 27-31.) Accordingly, dependent claim 39 is allowable over the Goss, Kannan and Camaisa references for at least this additional reason.

Group V: Claims 11-13, 20, 33, 34, 36 and 37

Claims 11-13, 20, 33, 34, 36 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Choung patent. The applicants respectfully request that the Board reverse this ground of rejection in view of the following.

Independent claims 11, 13 and 20 are not unpatentable in view of the Choung patent because the Choung patent neither teaches, nor suggests, (1) sending, from a guide terminal to a follower terminal, a browsing command, and (2) a follower terminal configured such that downloading applets and/or execution of applets is disabled. Each of these elements is addressed below.

The Choung patent neither teaches, nor suggests, sending, from a guide terminal to a follower terminal, "a browsing command". The guide terminal merely sends location information, not a browsing command. A collaborative controller program then sends this location information to a browser synchronizer program on the follower terminal. More specifically, the section of the Choung patent cited by the Examiner states:

In step 608, user 1 uses web browser 204 in terminal 102.1 to navigate a new web page from web site 116, via data network 106, or from any of the conventional web sites (112.1, 112.2, ..., or 112.N).

In step 610, web browser 204 informs browser tracker 208 the location information for the new web page. A specific type of web page location information is called URL (Uniform Resource Locator).

In step 612, browser tracker 208 sends the new web page location information to collaborative controller program 224, via data network 106. Collaborative controller program 224 stores the new web page location information into collaborative database 228.

In step 614, via data network 106, collaborative controller program 224 relays the new web page location information to all browser synchronizer(s) in the following terminal(s) according to the session member list stored in collaborative database 228. In this example, collaborative controller program 224 relays the new web page location information to browser synchronizer 216.

In step 616, the browser synchronizer(s) in the following terminal(s) updates/update its/their respective web browser(s) with the new web page location information. In this example, browser 216 updates web browser 214 with the new web page location information.

In step 618, the web browser(s) in the following terminal(s) loads/load the new web page based on the new web page location information. In this example, web browser 214 loads the new web page based on the new web page location information. [Emphasis added.]

To reiterate, the guide terminal sends location information, not a browser command.

Accordingly, claims 11 and 13 are not rendered obvious by the Choung patent for at least

this reason. Since claims 12, 33, 34, 26 and 37 depend, either directly or indirectly, from claim 11, they are similarly allowable over the Choung patent.

Further, the Choung patent neither teaches, nor suggests a follower terminal configured such that downloading applets and/or execution of applets is disabled. The Examiner notes that disabling applets is known. The Examiner concludes that it would have been obvious "to disable applets for obvious security reasons." Paper No. 12, page 7. However, the Examiner has not established any motivation in the art to disable applets in the context of the system discussed in the Choung patent. Accordingly, claims 11, 13 and 20 are not rendered obvious by the Choung patent for at least this reason. Since claims 12, 33, 34, 26 and 37 depend, either directly or indirectly, from claim 11, they are similarly allowable over the Choung patent.

Moreover with regard to independent claim 20, the Examiner did not even address the recited method for establishing a synchronized browsing session, and therefore did not establish even a prima facie showing of obviousness.

Group VI: Claims 14, 21, 22 and 35

Claims 14, 21, 22 and 35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Choung patent, in view of the Kannan publication. The applicants respectfully request that the Board reverse this ground of rejection in view of the following.

Since the purported teaching of the Kannan publication does not compensate for the deficiencies of the Choung patent with respect to claims 11 and 20, these claims are allowable for at least the same reasons discussed above with reference to the claims of Group V. Moreover, as discussed above, the security measures espoused in the Kannan publication are apparently limited to securing personal information, such as questions, personal data, and credit card information, needed "to complete a commercial transaction." Paragraph [0010]. Securing such personal information with encryption in no way suggests securing a browsing command using encryption. Accordingly, these claims are allowable for at least this additional reason.

Claims 23, 26, 27, 38 and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Camaisa patent. The applicants respectfully request that the Board reverse this ground of rejection in view of the following. Separate groups are addressed separately.

Group VII: Claims 23, 26 and 41

As discussed above with reference to the claims of Group III, one skilled in the art would not have been motivated to combine these patents as proposed by the Examiner. More specifically, restricting a user's access may be a legitimate concern in a system such as the Camaisa patent where web browsing is unguided. However, this does not suggest restricting access in a system where a *guide terminal leads* a synchronized browsing session as in the Goss patent. Accordingly, these claims are not rendered obvious by the Goss and Camaisa patents for at least this additional reason.

Group VIII: Claims 27 and 38

Since claims 27 and 38 depend from claim 23, they are allowable for the same reasons discussed above with reference to the claims of Group VII. Moreover, claims 27 and 38 are further allowable for the same reasons as discussed above with reference to dependent claim 39 of Group IV.

Group IX: Claims 24 and 25

Claims 24 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Goss patent in view of the Camaisa patent, and further in view of the Kannan publication. The applicants respectfully request that the Board reverse this ground of rejection in view of the following.

These claims are allowable over the cited references for at least the same reasons discussed above with reference to the claims of Group VII.

Moreover, to reiterate, the security measures espoused in the Kannan publication are apparently limited to securing personal information, such as questions, personal data, and credit card information, needed "to complete a commercial transaction." Paragraph

[0010]. Securing such <u>personal information</u> with encryption in no way suggests securing a <u>browsing command</u> using encryption.

IX. Appendix

An appendix containing a copy of the claims on appeal is filed herewith.

Conclusion

In view of the foregoing, the applicants respectfully submit that the pending claims are in condition for allowance. Accordingly, the applicant requests that the Board reverse each of the outstanding grounds of rejection.

Respectfully submitted,

December 23, 2003

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